

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

David Hough, see attachment A

*Plaintiff(s)*

v.

Ryan Carroll, see attachment A

*Defendant(s)*

Civil Action No. 2:24-cv-02886-WLH

SUMMONS IN A CIVIL ACTION ON THE SECOND AMENDED COMPLAINT

To: *(Defendant's name and address)*

RYAN CARROLL;  
2900 NE 7th Ave,  
Unit 2502,  
Miami, Florida 33137

See attachment B

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Attorney for Plaintiffs: Nico Banks. Address: 712 H St. NE, Unit 8571, Washington, DC 20002. Tel.: 971-678-0036

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

B. Moss

*Signature of Clerk or Deputy Clerk*



Date: 12/10/2024

Civil Action No. 2:24-cv-02886

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☐ Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

# ATTACHMENT A

1 Nico Banks, Esq.  
nico@bankslawoffice.com  
2 Filing on behalf of all Plaintiffs  
3 CA Bar No. 344705  
Banks Law Office  
4 712 H St NE,  
5 Unit #8571,  
Washington, DC 20002  
6 Tel.: 971-678-0036

7  
8 **UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

9 DAVID HOUGH; ) Case No.: 2:24-cv-02886-WLH  
10 AMUND THOMPSON; )  
11 ISABEL RAMOS; ) **SECOND AMENDED COMPLAINT**  
12 ANTHONY RAMOS; ) **FOR:**  
MICHAEL NIBARGER ) **1. FRAUD CONSPIRACY**  
13 ) **2. AIDING AND ABETTING**  
Plaintiffs, ) **FRAUD**  
14 vs. ) **3. FRAUDULENT TRANSFERS**  
15 ) **IN FURTHERANCE OF**  
RYAN CARROLL; ) **CONSPIRACY**  
16 MAX K. DAY; ) **4. AIDING AND ABETTING**  
17 MAX O. DAY; ) **BREACH OF FIDUCIARY**  
18 MICHAEL DAY; ) **DUTY**  
JARED DAY; )  
19 MATTHEW CROUCH; )  
20 CHRISTINE CARROLL; ) **CLASS ACTION**  
TROY MARCHAND; )  
21 BONNIE NICHOLS; ) **DEMAND FOR JURY TRIAL**  
22 TRAVIS MARKER;  
REYHAN PASINLI;  
23 YAX ECOMMERCE LLC;  
24 PRECISION TRADING GROUP, LLC;  
WA DISTRIBUTION LLC;  
25 PROVIDENCE OAK PROPERTIES,  
26 LLC;  
WA AMAZON SELLER LLC;  
27 YAX IP AND MANAGEMENT INC.  
28 (D.B.A. "FULFILLABLE");

1 MKD INVESTMENT ADVISOR, LLC;  
2 MKD FAMILY BENEFICIARY, LLC;  
3 MKD FAMILY PRIVATE  
4 MANAGEMENT COMPANY, LLC;  
5 MAX DAY CONSULTING, LLC;  
6 HOUTEX FARM EQUITY PARTNERS  
7 LLC;  
8 BUSINESS FINANCIAL SOLUTIONS  
9 ADVISORY LLC;  
10 EVO MAXX LLC;  
11 WWKB LLC;  
12 DREAMS TO REALITY LLC;  
13 PROFICIENT SUPPLY LLC;  
14 QUANTUM ECOMMERCE, LLC;  
15 WHOLESALE UNIVERSE, INC.;  
16 THE LAW OFFICE OF TRAVIS R.  
17 MARKER, A PROFESSIONAL  
18 CORPORATION (D.B.A. "MARKER  
19 LAW AND MEDIATION");  
20 PARLAY LAW GROUP A  
21 PROFESSIONAL CORPORATION;  
22 TOTAL-APPS, INC.;  
23 WELLS FARGO BANK, N.A.;BANK OF  
24 AMERICA;  
25 FIRST CITIZENS BANCSHARES, INC.;

26  
27 Defendants.

28  
**SECOND AMENDED COMPLAINT — CLASS ACTION**

29 Plaintiffs David Hough, Amund Thompson, Isabel Ramos and Anthony  
30 Ramos, and Michael Nibarger (collectively, "Plaintiffs" or "Class Representatives"),  
31 individually and on behalf of others similarly situated, by and through their attorneys,  
32 bring this class action complaint against the following Defendants: (1) Ryan Carroll;  
33 Max K. Day; Max O. Day; Michael Day; Jared Day; Matthew Crouch; Christine  
34 Carroll; Troy Marchand; Bonnie Nichols; Travis Marker; and Reyhan Pasinli

# ATTACHMENT B

ATTACHMENT B TO SUMMONS

**DEFENDANTS TO BE SERVED:**

RYAN CARROLL;  
2900 NE 7th Ave,  
Unit 2502,  
Miami, Florida 33137

MAX K. DAY;  
18210 Farnsfield Drive,  
Houston, Texas 77084

MAX O. DAY;  
3118 Brandon Hill Lane,  
Sugar Land, Texas 77479

MICHAEL DAY;  
25010 Ginger Ranch Drive,  
Katy, Texas 77494

JARED DAY;  
19710 Chara Ct,  
Cypress, TX 77433

MATTHEW CROUCH;  
9566 Greiner Rd,  
Clarence, NY 14031

CHRISTINE CARROLL;  
11298 Snow View Ct,  
Yucaipa, CA 92399

TROY MARCHAND;  
13350 Alston Dr.,  
Fishers, IN, 46037

BONNIE NICHOLS;  
2835 E Cotton St.  
Ste. C  
Longview, TX 75602

TRAVIS MARKER;  
333 2nd St.  
Suite 16,  
Ogden, UT, 84404

REYHAN PASINLI;  
26800 Aliso Viejo Pkwy  
Ste 130,  
Aliso Viejo, Ca 92656

YAX ECOMMERCE LLC;  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137

PRECISION TRADING GROUP, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WA DISTRIBUTION LLC;  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137

PROVIDENCE OAK PROPERTIES, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WA AMAZON SELLER LLC;  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137



YAX IP AND MANAGEMENT INC.;  
P.O. Box 1505  
Austin, TX 78767

MKD INVESTMENT ADVISOR, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MKD FAMILY BENEFICIARY, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MKD FAMILY PRIVATE MANAGEMENT COMPANY, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

MAX DAY CONSULTING, LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

HOUTEX FARM EQUITY PARTNERS LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

BUSINESS FINANCIAL SOLUTIONS ADVISORY LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

EVO MAXX LLC;  
18210 Farnsfield Drive,  
Houston, Texas 77084;

WWKB LLC  
25010 Ginger Ranch Drive,  
Katy, Texas 77494

DREAMS TO REALITY LLC  
2900 NE  
7th Ave, Unit 2502,  
Miami, Florida 33137

QUANTUM ECOMMERCE, LLC  
13350 Alston Dr.,  
Fishers, IN, 46037

WHOLESALE UNIVERSE, INC.  
2835 E Cotton St.  
Ste. C  
Longview, TX 75602

THE LAW OFFICE OF TRAVIS R. MARKER, A PROFESSIONAL  
CORPORATION (D.B.A. "MARKER LAW AND MEDIATION")  
333 2nd St.  
Suite 16,  
Ogden, UT, 84404

PARLAY LAW GROUP A PROFESSIONAL CORPORATION  
333 2nd St.  
Suite 16,  
Ogden, UT, 84404

TOTAL-APPS, INC.  
c/o Aaron C. Watts  
23986 Aliso Creek Rd.,  
#707  
Laguna Niguel, CA 92677

WELLS FARGO BANK, N.A.  
350 N. St. Paul Street,  
Dallas, TX, 75201

PROFICIENT SUPPLY LLC  
207 20th St. SE  
Hickory, NC 28602

BANK OF AMERICA  
c/o C T CORPORATION SYSTEM  
1200 SOUTH PINE ISLAND ROAD  
PLANTATION, FL 33324

FIRST CITIZENS BANCSHARES, INC.  
239 Fayetteville St  
Raleigh, NC 27601